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NAS SOUTH WEYMOUTH  
5090.3a

U S NAVY RESPONSE TO U S EPA COMMENTS RECIEVED ON 23 AUGUST 2016 FOR  
THE DRAFT PERFLUOROALKYL SUBSTANCES PERLIMINARY ASSESSMENT WORK  
PLAN DATED 11 AUGUST 2016 FORMER NAS SOUTH WEYMOUTH MA  
08/24/2016  
RESOLUTION CONSULTANTS

**AUGUST 24, 2016, RESPONSE TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
(U.S. EPA) COMMENTS RECEIVED AUGUST 23, 2016 FOR THE DRAFT PERFLUOROALKYL  
SUBSTANCES PRELIMINARY ASSESSMENT WORK PLAN, DATED AUGUST 11, 2016, FORMER  
NAVAL AIR STATION SOUTH WEYMOUTH, WEYMOUTH, MASSACHUSETTS**

Note that where the comment response provides revised text, original text is shown in italics, text additions are shown in bold italics, and deleted text is shown as strikethrough.

**U.S. EPA PAGE-SPECIFIC COMMENTS:**

1. **Comment:** Page 1, Section 1.0 – Please delete, “... that may have been present in aqueous film-forming foam (AFFF)....” While EPA agrees that AFFF is likely the most common PFC-containing product used at NAS-South Weymouth, as discussed in Section 2.0 of the draft work plan, there may have been other industrial and consumer PFC-containing products (i.e. chemical fume suppressants, soil, stain, grease, and water resistant coatings; automotive, mechanical, aerospace, chemical, electrical, medical, and building/construction materials, etc.) used, stored or disposed of during historic NAS-South Weymouth operations that are worthy of consideration/evaluation. Please ensure that the PA explores all potential PFAS sources.

**Response:** Requested change will be made.

2. **Comment:** Page 4, Section 3.0, 1st paragraph – Further discussion is warranted regarding the second sentence. Specifically, this text states that “The scope of the PA will include both sites with Records of Decision (RODs) and sites with no RODs”. However, this seems to contradict Navy’s August 8, 2016 commitment to evaluate the potential release/disposal of PFAS at sites with existing CERCLA RODs (on Navy-retained or previously transferred properties) where existing groundwater monitoring networks, in a separate, accelerated PA/SI. Assuming this is consistent with Navy’s planned approach, please amend this paragraph to more clearly identify and describe these two separate, but concurrent field efforts.

**Response:** The following will be added to the end of the 1<sup>st</sup> paragraph of Section 3.0:

***Note that concurrent to this PA effort, a Basewide PFAS SAP is being prepared to evaluate the presence of PFASs at ROD sites. Research on the use of PFASs at ROD sites is being included in this PA, so that potential release areas can be identified and further evaluated, if necessary.***

3. **Comment:** Appendices – Please include the “PFAS Preliminary Assessment” schedule attached to Navy’s August 8, 2016 letter as Appendix B.

**Response:** Requested change will be made.